

The Organic Materials Review Institute thanks the National Organic Program and the NOSB for the opportunity to conduct professional Technical Advisory Panel reviews for 16 petitioned materials. These were tough issues. Please don't shoot the messenger!

I'm going to describe the review process. Our contact with the USDA required that OMRI gather technical background information, create databases for each material, and secure at least three TAP reviewers for each material. OMRI staff members were not TAP reviewers. TAP reviewers represented a cross section geographically and in their professional expertise in their fields. The identities of the TAP reviewers were confidential during the review process. Our understanding is that the NOP has continued that anonymity.

The TAP evaluated each material against the OFPA criteria that were designed to evaluate suitability for organic production. Processing materials were also analyzed against the criteria approved by the NOSB earlier this year. As required in our contract, each material was analyzed against these criteria to reach a conclusion on the status for use in organic production.

The database with the analyses and all background materials were sent to the TAP reviewers who then had 30 days to review the material, do their own research, and then send OMRI their vote as to whether the material is synthetic or non-synthetic, allowed or prohibited, and the annotation. The TAP did not directly review the materials for food safety except in the context of the human health criteria. The TAP also did not directly address efficacy, economic impact, or other criteria as these are not part of the OFPA criteria.

OMRI's staff then compiled the reviews into databases, with a recommendation, that were sent to the NOP in September. All background information was also sent.

As you know, these materials were not easy to review. They had all been tabled in previous NOSB meetings or were sent back to the TAP to be re-reviewed. We were directed to evaluate the petitions as received. Six in particular (amino acids for crops, livestock, and processing; enzymes for livestock and processing; and parasiticides) were broader reviews rather than a specific material for a specific use, as was the intent of the petition process. Where there was not TAP reviewer consensus, OMRI listed out different options for the NOSB to consider.

It was not within OMRI's authority to release this information to the public. We are glad to hear the process will change to allow for public comment.

OMRI encourages the NOP and NOSB to pursue ongoing materials reviews and we offer our assistance to continue these reviews.